

# **Exhibit 16**

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ZURI OSTERHOLT, et al.,	)	Case Number: 16-cv-5089
	)	
Plaintiff,	)	Judge Manish S. Shah
	)	
vs.	)	
	)	
COREPOWER YOGA, LLC,	)	
	)	
Defendant.	)	

**DECLARATION OF ELENA KATSULIS**

I, Elena Katsulis, declare as follows:

1. I am over 18 years of age and have personal knowledge of the facts set forth herein.
2. What I say in this declaration is the truth. I voluntarily agreed to be interviewed about the matters set forth in this declaration, and I voluntarily agreed to provide this declaration without any duress, threats, intimidation, coercion or promise of special benefits. I understand that I did not have to give this declaration. I understand that the person who interviewed me and provided me with a draft declaration is a representative of CorePower Yoga LLC ("CorePower") and does not represent me. I understand that this declaration will be used in the above-captioned matter in support of CorePower, and I further understand that if a collective action is certified in the above matter, then I may be invited to participate in the litigation as a class member. I further understand that if a class action is certified in the above matter, I may fall within the certified class or classes. I was given the opportunity to review and revise this draft declaration.

3. I am employed by CorePower. My current position is an Instructor. I started as an Intern in March 2016 and became an Instructor in May 2016. My home studio is the Roscoe Village studio in Chicago, Illinois, and have also taught classes at Bucktown, Lincoln Park, Sauganash, and Lincoln Square studios located in Chicago, Illinois. I teach ten permanent classes per week consisting of Hot Power Fusion (“HPF”) and C2. I am also trained in Core Restore. I started teaching C2 in November 2016.

4. As an Intern, my hourly wage rate was \$10.00 per hour. As an Instructor, my standard hourly wage rate is \$15.50 per hour. At my studio, Instructors are paid for two hours of work time. This includes class time (which is generally one hour), as well as up to a half-hour of time before and after class.

5. I typically arrive at the studio a half-hour before my class starts. During the 30 minutes before class time, I prepare the studio room, do some class preparation, and work the front desk. I have seen other Instructors prepare for their classes at the front desk during the 30 minutes before class time, including working on their sequences and reviewing their playlist.

6. During the 30 minutes after class time, I clean up the studio and work the front desk. I also spend this time interacting with my students. My managers permit me to leave the studio early before my 30 minutes after class is over once the students leave and as long as my duties are completed.

7. I spend little to nominal time outside of my studio time preparing for my classes. First, the HPF class format that I teach has existing sequences built into the class. There are two spots where I can make small modifications, but I usually decide which modification to use on the fly. For my C2 class, I do not build the sequences for a C2 from scratch and I prepare a new sequence every two weeks. In fact, I have been counseled by a manager that I should keep my

C2 sequence for two weeks. Overall, I spend a nominal amount of time preparing my sequences. CorePower does not require that I build C2 classes from scratch or that I change my C2 sequence at any specific frequency.

8. I do not spend a lot of time preparing a theme. Preparing my theme is part of my time spent sequencing. I may vary my theme a few times per week. CorePower does not require that I change the theme for each class. Indeed, CorePower has no requirement that I spend any time preparing for my theme or that I vary my theme at any specific frequency. In fact, I have decided on my theme right before I walk into class.

9. I spend little to nominal time preparing my playlists for my classes. I spend less than 30 minutes creating an HPF or C2 playlist, and I can create a playlist in as little as 10 minutes. I usually prepare my playlist by using Spotify. I typically listen to music while I am spending time at home. I flag songs I may want to use and then later arrange the songs into a playlist. I do not create a new playlist every week. I reuse my playlists, and will create a new playlist once every 2-3 weeks. I sometimes create playlists by swapping out a few songs, which takes even less time. CorePower does not require me to create a new playlist from scratch, spend any time creating a playlist, or that I vary the sequence at any specific frequency.

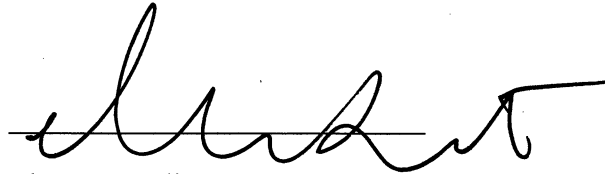
10. I spend no time outside of studio time on marketing. I spend no time marketing on social media. CorePower does not require that I post yoga-related materials to social media.

11. I spend no more than a few minutes per day reading and responding to required emails. Most of these emails are sub requests, and I am not required to read or respond to sub request emails. Each studio may send separate studio announcement emails to the Instructors. I spend less than a few minutes per day looking at reviewing studio announcement emails.

12. On a weekly basis, I always make and made more than the minimum wage. If I were to decide to prepare for class outside of my time at the studio, that preparation would only take a small amount of time and did not bring my average pay below the minimum wage.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: 2-27-17

A handwritten signature in black ink, appearing to read 'Elena Katsulis', written over a horizontal line.

Elena Katsulis